

REMARKS

Claims 1-6, 8-16, 18, and 20-23 are currently pending in the patent application. The Examiner has rejected Claims 1-4, 6, 8-13, 15-16, 18, and 20-23 under 35 USC 102(e) as being anticipated by the Yu patent; and, has rejected Claims 5 and 14 under 35 USC 103(a) as being unpatentable over Yu in view of Shteyn. For the reasons set forth below, Applicants believe that the claims, as amended, are patentable over the cited art.

The present invention addresses the problem of communicating service information, and more specifically, map service information, from a server to a user device having limited capability to display and interact with the information. Under the present invention, user input commands are sent to a command processing means which is independent of the user device. The command processing means interprets user input and sends the interpreted user input to the server. Upon receipt of the interpreted user input commands, the server sends the map service information, including service mapping parameters, to the user device. The user device can then display and interact with the service map information, since the service mapping parameters are correlated to the input capabilities of the user device (see: the Specification at page 6, lines 15-22,

etc.). The command processing means may access user data at a database, which user data may include service mapping parameters, user identifier, and type of user device. In addition, the user data may be modified by either the server or the user device. Applicants have amended the language of the independent claims to expressly recite that the command processing means is independent of the user device, as is clearly taught and illustrated (e.g., Figs. 1 and 5) by the original application. Given the fact that the user device has limited capabilities, the present invention provides that an independent command processing entity handle the interpreting. Applicants believe that the invention as claimed is neither taught nor suggested by the cited art.

The Yu patent is directed to a method and apparatus for displaying images on mobile devices wherein the user device sends its request directly to a server, the user access and device information is stored based on a subscription (Col. 6, lines 30-50), and the server information is preprocessed for the subscribing user (see: Col. 7, lines 11-20). As interpreted by the Examiner, the "steps of generating and transmitting the request...must inherently include..." the claimed steps. Applicants respectfully disagree. If a reference does not teach the claimed features, inherency cannot be relied on for rejecting the claimed features,

absent some basis in the cited art or the available body of knowledge. Applicants assert that the Examiner is improperly applying the inherency standard. The Examiner has stated that it is inherent that Yu performs the steps of "transmitting the received user input command to a command processing means within the user device...". Applicants contend that Yu does not teach any command processing means. Further, even if Yu had a command processing means in its user device, such would not anticipate the claimed invention. Under the present invention, a user device with limited processing capabilities would not have command processing means within the device. Rather, the present invention requires independent command processing means to perform the interpreting of a user command and transmission of the interpreted command to the server.

Applicants further assert that Yu does not inherently perform the claimed step of providing map service information from the server for the user device including service mapping parameters correlated for the input capabilities of the user input device. The Yu patent does not teach or suggest the step and means for dynamically interpreting and providing map service information including service mapping parameters correlated for the input capabilities of the user input device. What the Yu patent

provides is for preprocessed user display information to be retrieved from the server and sent to the user. As illustrated in Fig. 7 of Yu, a full map display is preprocessed by dividing it into segments, wherein each segment can be displayed at a given time by the user device, so that "all parts in the original image can be recursively viewed" (Yu Abstract).

Applicants contend that the claimed invention is not anticipated by the teachings of the Yu patent. For a reference to anticipate claim language under 35 USC 102, that reference must teach each and every claim feature. Since the Yu patent does not teach transmitting a user command to a command processing means which is independent of the user device, does not teach an independent command processing means dynamically interpreting the user input command and transmitting the interpreted user input command to the server, and does not teach the server dynamically providing map service information including service mapping parameters correlated for the input capabilities of the user device, it cannot be concluded that the Yu patent anticipates the invention as claimed.

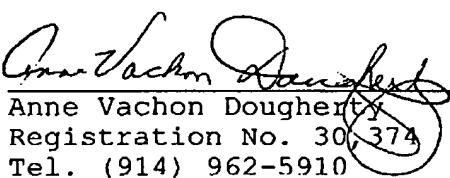
With regard to the obviousness rejections of Claims 5 and 14, Applicants rely on the discussion of the Yu patent presented above, and respectfully assert that the Shteyn

patent does not provide those teachings which are missing from the Yu patent. Shteyn is cited for disclosing that a user can initiate a change in preferences or profiles that are stored in a remote database. Modifying Yu so that a user can change subscription information stored at the server would not result in the invention as claimed, since neither Yu nor Shteyn teaches or suggests the claim features of transmitting a user command to a command processing means which is independent of the user device, an independent command processing means dynamically interpreting the user input command and transmitting the interpreted user input command to the server, and the server dynamically providing map service information including service mapping parameters correlated for the input capabilities of the user device. Accordingly, Applicants conclude that the invention is neither anticipated nor obviated by the cited art.

Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, withdrawal of the rejections, and allowance of the claims.

Respectfully submitted,  
Y. Chen, et al

By:

  
Anne Vachon Dougherty  
Registration No. 30,374  
Tel. (914) 962-5910

JP920000293-US1

-11-